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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 ELIZABETH POOLE, as Individual Assignee of
10 Rights of RENE ARGUELLES JR.,

11 Plaintiff,

v.

12 PROGRESSIVE DIRECT INSURANCE
13 COMPANY,

14 Defendant

Case No: 2:24-cv-01981-CDS-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR FILING
OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT
(Second Request)**

[ECF No. 28]

15 Defendant PROGRESSIVE DIRECT INSURANCE COMPANY, and Plaintiff ELIZABETH
16 POOLE, through their respective counsel, stipulate and agree as follows:

17 On May 22, 2025, Defendant filed a Motion for Summary Judgment ("Motion") [ECF #25].
18 Plaintiff's Opposition to the Motion is currently due on July 14, 2025.

19 Defendant is still in the process of reviewing the complete claims file, preparatory to
20 production of the same. Production of these documents has been delayed due to lead counsel for
21 Defendant Progressive having been in trial in another matter. Plaintiff has requested such documents
22 and sufficient time to review the same prior to completing her opposition to Defendant's Motion.
23 As such, the parties have agreed to a 45 day extension for Plaintiff to file her Opposition to the
24 Motion. The new due date for the Opposition will be August 28, 2025.

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1 This Stipulation is submitted in good faith and is not interposed for purposes of delay. This
2 is the second request to extend the deadline for Plaintiff to file an Opposition to Defendant's Motion
3 for Summary Judgment.

4 DATED: June __, 2025

DATED: June 26, 2025

5 **OHLSON CORNE LLP**

BARRON & PRUITT, LLP

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7 By: /s/ Justin A. Corne.
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By: /s/ William H. Pruitt
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11 *Attorneys for Defendant*

12 **IT IS SO ORDERED.**

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15 
UNITED STATES DISTRICT JUDGE

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17 DATED June 30, 2025
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